

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

MARQUIS WASHINGTON

Case: 2:23-mj-30221

Assigned To : Unassigned

Assign. Date : 5/30/2023

Case No. Description: RE: MARQUIS  
WASHINGTON (EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 U.S.C. § 922(n)

*Offense Description*

Receipt of a Firearm by a Person Under Indictment

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.

May 30, 2023

Date: \_\_\_\_\_

City and state: Detroit, Michigan  
*Complainant's signature*

Special Agent Christopher Pennisi, FBI

*Printed name and title**Judge's signature*

Hon. David R. Grand, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN CRIMINAL COMPLAINT**

I, Christopher S. Pennisi, being first duly sworn, hereby state:

1. I have been employed as a Special Agent of the Federal Bureau of Investigation for eighteen years. I am currently assigned to the Violent Crime Squad in the Detroit Division of the FBI. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. FBI is currently conducting a criminal investigation concerning MARQUIS WASHINGTON for violation of 18 U.S.C. § 922(n) – Receipt of a Firearm by a Person Under Indictment.

**PROBABLE CAUSE**

***RECENT POLICE CONTACT AND CRIMINAL HISTORY***

4. Affiant reviewed a computerized criminal history (CCH), Michigan 3rd Circuit Court records, and Michigan 36th District Court records regarding

WASHINGTON. WASHINGTON is currently under indictment for the following felony offenses:

- a. On or about October 18, 2021, WASHINGTON was charged with felony Unlawful Driving Away of a Motor Vehicle and Felony Receiving and Concealing Stolen Property (\$20,000 or more) in case 22-002523-01-FH. On March 30, 2022, WASHINGTON was bound over to 3rd Circuit Court. WASHINGTON is on bond in this case and trial is pending.
  - b. On or about July 11, 2022, WASHINGTON was charged with Felony Assaulting, Resisting, Obstructing Police in case 22-006457-02-FH. On October 12, 2022, WASHINGTON was bound over to 3rd Circuit Court. WASHINGTON is on bond in this case and trial is pending.
  - c. On or about July 27, 2022, WASHINGTON was charged with Felony Carjacking, Felony Carrying a Concealed Weapon, Felony Assaulting, Resisting, Obstructing Police, and Fleeing and Eluding in case 2022-2205882702-FY. WASHINGTON is currently detained on this case but was previously on bond on a GPS tether. His preliminary exam is scheduled for June 30, 2023 in the 36th District Court.
5. In addition to the crimes for which WASHINGTON is currently charged and pending adjudication, WASHINGTON is the suspect in a carjacking

from April 30, 2023 and an armed robbery that occurred on May 2, 2023. Both the April 30th robbery and the May 2nd carjacking were committed while WASHINGTON was on bond, on GPS tether. WASHINGTON's GPS tether information is consistent him being present at both the April 30th carjacking and the May 2nd robbery.

***MAY 11, 2023 - WEAPONS ARREST***

6. On May 11, 2023, WASHINGTON was inside a gas station in Detroit, Michigan that is monitored via Project Greenlight video. Due to WASHINGTON's recent criminal history and suspected involvement in the April 30th carjacking and May 2nd robbery, analysts and officers from the Detroit Police Department monitored WASHINGTON while he was inside the gas station.

7. While in the gas station, WASHINGTON appeared to pick up and place a handgun in his waistband. WASHINGTON left the gas station and got into the backseat of a white Ford Fusion, while still in possession of the firearm.

8. The analyst/officer monitoring the Project Greenlight video from the gas station made notifications regarding their observations of WASHINGTON. A Detroit Police patrol unit then stopped the white Ford Fusion containing WASHINGTON. Officers removed WASHINGTON from the back of the car and recovered a loaded, semi-automatic Glock model 30, 45 caliber handgun, with an extended magazine from the floor of the car, directly in front of where

WASHINGTON was seated. WASHINGTON was arrested for carrying a concealed weapon.

***FIREARM REGISTRATION AND INTERSTATE NEXUS***

9. On May 12, 2023, an officer requested a firearms trace summary on the semi-automatic Glock model 30, 45 caliber handgun. On May 18, 2023, the trace summary was completed and was provided to the Detroit Police Department. Per the firearms trace summary, the purchaser of the semi-automatic Glock model 30, 45 caliber handgun purchased and registered the firearm on April 29, 2023.

10. I am aware the semi-automatic Glock model 30, 45 caliber handgun was purchased more than a year after WASHINGTON was bound over to the 3rd Circuit Court of Michigan on March 30, 2022 for the stolen vehicle felonies, and more than six months after WASHINGTON was bound over in the 3rd Circuit Court of Michigan on October 12, 2022 for assaulting, resisting, obstructing police.

11. I am an FBI firearms instructor and have experience with numerous firearms including those manufactured by Glock, Inc. I know that Glock, Inc. has no manufacturing facilities in Michigan. Based upon that experience, as well as my own research, I have determined that the semi-automatic Glock model 30, 45 caliber handgun WASHINGTON possessed on May 11, 2023 is a firearm as defined under 18 U.S.C. § 921 and was manufactured outside of the state of

Michigan after 1898, and therefore had traveled in and affected interstate commerce

### **CONCLUSION**

12. At the time WASHINGTON was found to be in possession of the semi-automatic Glock model 30, 45 caliber handgun on May 11, 2023, he was under indictment in the 3<sup>rd</sup> Circuit Court in Wayne County, Michigan for multiple crimes punishable by a term of imprisonment of more than one year.

13. The pistol WASHINGTON possessed on May 11, 2023 in the Eastern District of Michigan was first sold to the public on April 29, 2023.

WASHINGTON has been under indictment since at least March 30, 2022.

WASHINGTON had to have received that firearm on or after April 29, 2023, and therefore, did so while he was under indictment.

14. Finally, the firearm WASHINGTON possessed travelled in interstate commerce.

15. There is probable cause that WASHINGTON committed the offense of receipt of a firearm while under indictment in violation of 18 U.S.C. § 922(n).

16. In consideration of the foregoing, I respectfully request that this Court issue a complaint against WASHINGTON for violation of 18 U.S.C. § 922(n).

17. Further in consideration of the foregoing, I respectfully request that this court issue an arrest warrant for WASHINGTON for violation of 18 U.S.C. § 922(n).

Respectfully submitted,

Handwritten signature of Christopher S. Pennisi in blue ink.

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CHRISTOPHER S. PENNISI  
Special Agent, FBI

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Handwritten signature of David R. Grand in blue ink.

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Hon. David R. Grand  
United States Magistrate Judge

Dated: May 30, 2023